

ORIGINAL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTIAN CASEY LLC, et al.,

08-CV-00870 (GBD) (JCF)

Plaintiffs,

- against -

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

AE STORES, INC., et al.,

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jeremy L. Reiss, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

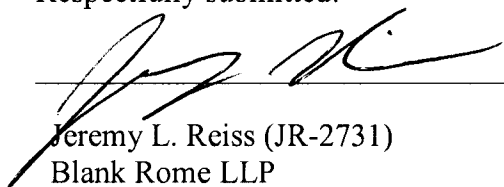
Dennis P. McCooe
Blank Rome LLP
One Logan Square,
130 North 18th Street
Philadelphia, PA 19103-6998
Phone: (215) 569-5580
Fax: (215) 569-5555
McCooe@blankrome.com

Mr. McCooe is a member in good standing of Bars of the State of New Jersey and the Commonwealth of Pennsylvania.

There are no pending disciplinary proceedings against Mr. McCooe in any State or Federal Court.

Dated: August 29, 2008
City, State: New York, New York

Respectfully submitted:



Jeremy L. Reiss (JR-2731)
Blank Rome LLP
The Chrysler Building,
405 Lexington Avenue
New York, NY 10174-0208
Phone: (212) 885-5245
Fax: (212) 885-5001

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTIAN CASEY LLC, et al.,

08-CV-00870 (GBD) (JCF)

Plaintiffs,

- against -

AE STORES, INC., et al.,

Defendants.

**AFFIDAVIT OF
JEREMY L. REISS
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

State of NEW YORK)
) ss.
County of NEW YORK)

JEREMY L. REISS, being duly sworn, hereby deposes and says as follows:

1. I am an associate of Blank Rome LLP, counsel for defendant Forman Mills, Inc. (“Forman Mills”) in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion of Forman Mills to admit Dennis P. McCooe as counsel *pro hac vice* to represent Forman Mills in this matter.

2. I am a member in good standing of the bar of the State of New York. Additionally, I am admitted to practice before, and am in good standing with, the United States District Court for the Southern District of New York and the United States District Court for the Eastern District of New York.

3. I have known Mr. McCooe since 2007.

4. Mr. McCooe is an associate at Blank Rome LLP in Philadelphia, Pennsylvania.

5. I have found Mr. McCooe to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

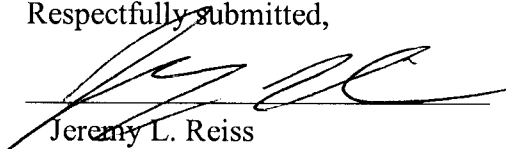
6. Accordingly, I am pleased to move the admission of Dennis P. McCooe, *pro hac*

vice.

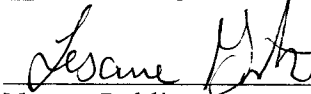
7. I respectfully submit herewith a proposed order granting the admission of Dennis P. McCooe, *pro hac vice*.

WHEREFORE, it is respectfully requested that the motion to admit Dennis P. McCooe, *pro hac vice*, to represent Plaintiffs in the above captioned matter, be granted.

Respectfully submitted,


Jeremy L. Reiss
SDNY Bar Code: JR-2731

Sworn to before me this
29th day of August 2008



Notary Public

LESCENE GIBBONS
Notary Public, State of New York
No. 01GI6044509
Qualified in New York County
Commission Expires July 10, 20 10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
)	
CHRISTIAN CASEY LLC, et al.,)	08-CV-00870 (GBD)
)	
Plaintiffs,)	AFFIDAVIT OF DENNIS P.
)	MCCOOE IN SUPPORT
- against -)	OF APPLICATION FOR
)	ADMISSION
AE STORES, INC., et al.,)	<i>PRO HAC VICE</i>
)	
Defendants.)	
)	
-----	X	

COMMONWEALTH OF PENNSYLVANIA):
): s.s.:
COUNTY OF PHILADELPHIA):

DENNIS P. MCCOOE, being duly sworn, deposes and says:

1. I submit this affidavit in support of the motion for admission to this Court in the above-captioned case, *pro hac vice*. This affidavit is based upon my personal knowledge.
2. I reside at 242 East Highland Avenue, Philadelphia, PA 19118. I am an attorney with the law firm of Blank Rome LLP ("Blank Rome"), with offices for the practice of law at, among other places, One Logan Square, Philadelphia, Pennsylvania 19103. Blank Rome also has a New York office located at 405 Lexington Avenue, New York, NY 10174.
3. I was admitted to the bars of the Commonwealth of Pennsylvania and the State of New Jersey in 1994. I am an active member in good standing of the bar of the State of New Jersey and the Commonwealth of Pennsylvania. I am also an active member in good standing of the following federal courts: the United States District Court for the Eastern District of Pennsylvania, the United States District Court for the Middle District of Pennsylvania, the United States District Court for the District of New Jersey, and the United States Court of

Appeals for the Third Circuit. Certificates of Good Standing for the Commonwealth of Pennsylvania and the State of New Jersey are appended to this Affidavit.

4. I hereby request that I be admitted to this Court for the purpose of representing defendant, Forman Mills, Inc., in connection with the above-captioned case, *pro hac vice*. I intend to act as trial counsel in connection with this action.

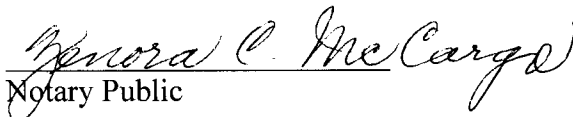
5. There are no pending disciplinary proceedings against me in any State or Federal court.

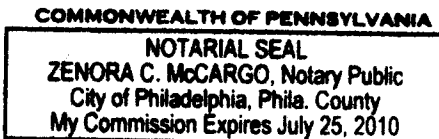
6. I recognize that if I am admitted *pro hac vice* I will be within the disciplinary jurisdiction of this court, and I will abide by all of the rules applicable to practice in this jurisdiction.

WHEREFORE, it is respectfully requested that I be permitted to appear before this Court in connection with the trial of this action, including all pre-trial and post-trial proceedings.


DENNIS P. MCCOOE

Sworn to before me this
28th day of August, 2008.


Notary Public



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTIAN CASEY LLC, et al.,

08-CV-00870 (GBD) (JCF)

Plaintiffs,

- against -

**ORDER FOR ADMISSION
PRO HAC VICE**

AE STORES, INC., et al.,

Defendants.

Upon the motion of Jeremy L. Reiss, attorney for defendant Forman Mills, Inc. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Dennis P. McCoee
Blank Rome LLP
One Logan Square,
130 North 18th Street
Philadelphia, PA 19103-6998
Phone: (215) 569-5580
Fax: (215) 569-5555
McCoee@blankrome.com

is admitted to practice *pro hac vice* as counsel for defendant Forman Mills, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys. If this action is assigned to

the (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____, 2008
New York, New York

United States District/Magistrate Judge



Supreme Court of Pennsylvania

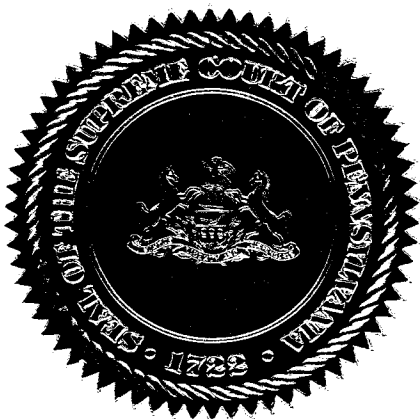
CERTIFICATE OF GOOD STANDING

Dennis P. McCooe, Esq.

DATE OF ADMISSION

December 15, 1994

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 25, 2008

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'P'.

John W. Person, Jr., Esq.
Deputy Prothonotary

Supreme Court of New Jersey

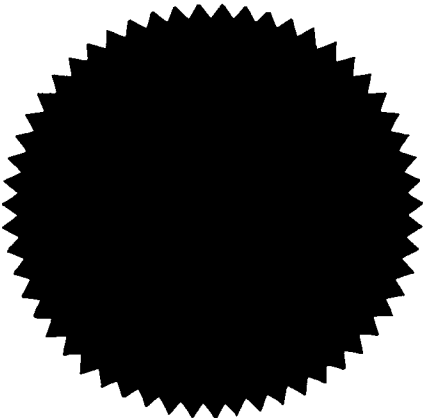


Certificate of Good Standing

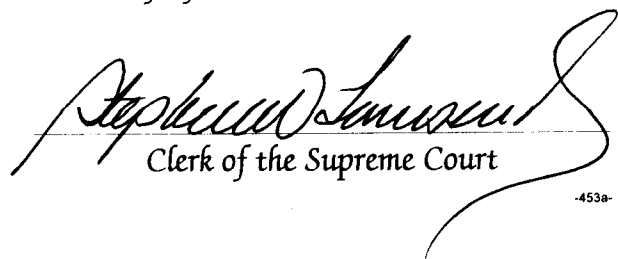
This is to certify that **DENNIS P MC COOE**
(No. **021641994**) was constituted and appointed an Attorney at Law of New
Jersey on **December 19, 1994** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
26TH day of August, 20 08


Clerk of the Supreme Court

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) .ss:
COUNTY OF NEW YORK)

DEBORAH KARPEL, being duly sworn, deposes and says:

That I am over 18 years of age, not a party to this action and reside in New York, New York.

That on the 2nd day of September, 2008, I served the within **MOTION TO ADMIT COUNSEL *PRO HAC VICE*** upon the following at the address indicated and designated for that purpose:

Stephen M. Roseman
Roseman, Beerman & Beerman LLP
3000 Marcus Avenue – 3W6
Lake Success, NY 11042

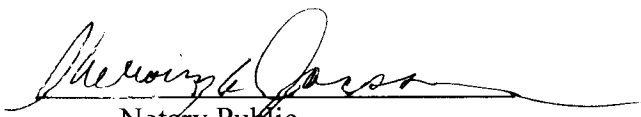
Kenneth R. Schacter
Silverberg Stonehill Goldsmith & Haber P.C.
111 West 40th Street,
New York 10018

Brent H. Blakely
Blakely Law Group
915 North Citrus Avenue
Hollywood, California 90038

by depositing a true copy of the enclosed in a properly addressed wrapper in an official depository under the United States Post Office for their delivery service.


DEBORAH KARPEL

Sworn to before me this
2nd day of September, 2008


Notary Public
HILLARY K. JACKSON
Notary Public, State of New York
No. 01JA6107319
Qualified in New York County
Commission Expires March 22, 2012